STIPULATION AND [PROPOSED] ORDER TO APPEAR REMOTELY

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Plaintiff Erin Robertson ("Plaintiff") and Defendant Fidelity Life Association, A Mutual
Legal Reserve Company ("Defendant") (together, the "Parties"), by and through their respective
counsel, hereby submit the following Stipulation to Appear Remotely via Zoom Videoconference
for the Case Management Conference on Monday, February 24, 2025 at 9:00 a.m.

WHEREAS, on January 23, 2025, the Court scheduled an in-person Case Management Conference for Monday, February 24, 2025 at 9:00 a.m. in Courtroom 2 of the above-captioned court located in Reno, Nevada (Dkt. No. 14);

WHEREAS, both counsel for Plaintiff and Defendant are located outside Reno, with Plaintiff's counsel residing in Las Vegas and Defendant's counsel residing in California;

WHEREAS, the Parties now jointly request permission for both Parties' counsel to appear remotely via Zoom videoconference for the Case Management Conference in the interest of conserving the Parties' resources;

WHEREAS, the Parties' request is made in good faith and for good cause as it will substantially reduce the Parties' fees and costs associated with travel in order to appear in person for the Case Management Conference;

1	ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED THAT the Parties		
2	through their respective counsel, agree and jointly request permission to appear remotely via Zoom		
3	videoconference for the Case Management Conference on Monday, February 24, 2025 at 9:00 a.m		
4			
5	Dated: January 30, 2025	KAZEROUNI LAW GROUP, APC	
6			
7	Ву:	/s/ Mona Amini Gustavo Ponce (NV Bar No. 15084)	
8		Mona Amini (NV Bar No. 15381) 6940 S. Cimarron Road, Suite 210	
9		Las Vegas, Nevada 89113 Telephone: (800) 400-6808	
10		Facsimile: (800) 520-5523 Attorneys for Plaintiff	
11	Dated: January 30, 2025	PERKINS COIE LLP	
12			
13	By:	/s/ James G. Snell James G. Snell (pro hac vice)	
14		Saroop Kaur Sandhu (<i>pro hac vice</i>) 3150 Porter Drive	
15		Palo Alto, California 94304-1212	
		Telephone: +1.650.838.4300 Facsimile: +1.650.838.4350	
16		David R. Koch (NV Bar No. 8830)	
17		KING SCOW KOCH DURHAM LLC 11500 S. Eastern Ave., Ste. 210	
18		Henderson, NV 89052 Telephone: (702) 833-1100	
19		Facsimile: (702) 833-1107	
20		dkoch@kskdlaw.com	
21		Attorneys for Defendant	
22	ORDER		
23	Having considered the parties' Stipulation, IT IS HEREBY ORDERED that counsel or		
24	Plaintiff and counsel for Defendant may appear via Zoom for the Case Management Conference or		
25	February 24, 2025 at 9:00 a.m.		
26	IT IS SO ORDERED.	O 5 R	
27	Dated: January 31, 2025	Hon. Craig S. Denney	
28		U.S. Magistrate Judge	